

SO. CAL. EQUAL ACCESS GROUP  
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Attorneys for Plaintiff  
NELSON CHILIN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

NELSON CHILIN,  
Plaintiff,  
vs.

J. N &J GROUP INVESTMENT LLC; and  
DOES 1 to 10,  
Defendants.

**Case No.: 5:23-cv-01530 FLA (KKx)**

**Plaintiff's Notice of Motion and Motion  
for Default Judgment by Court**

Date: December 15, 2023  
Time: 1:30 p.m.  
Courtroom: 6B

Honorable Judge Fernando L. Aenlle-  
Rocha

To Defendant J. N &J GROUP INVESTMENT LLC and the attorneys of record, if any: Please take notice that on December 15, 2023, at 1:30 p.m., or as soon thereafter as this matter may be heard by this Court located at 350 West First Street, Los Angeles, California, Plaintiff NELSON CHILIN will present Plaintiff's motion for default judgment against Defendant J. N &J GROUP INVESTMENT LLC. The Clerk has previously entered the default on said Defendant on October 6, 2023 (Dkt. #16).

At the time and place of hearing, Plaintiff will present proof of the following matters: (1) Defendant J. N &J GROUP INVESTMENT LLC is not a minor or an incompetent person or in military service or otherwise exempted under the Soldier and

1 Sailor's Civil Relief Act of 1940; (2) Defendant J. N &J GROUP INVESTMENT LLC  
2 has not appeared in this action; and (3) Plaintiff is entitled to judgment against said  
3 Defendant on account of the claims pleaded in the complaint, to wit: a violation of the  
4 Americans with Disabilities Act, the Unruh Civil Rights Act, the California Disabled  
5 Persons Act, the California's Unfair Competition Act, and Negligence.

6 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,  
7 \$2,515.00 in attorney's fees, and \$587.00 in costs as set forth in the attached Declaration  
8 of Jason J. Kim and an Order directing the Defendant to: make alterations in such a  
9 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,  
10 advantages, or accommodations offered by Defendant are readily accessible to and usable  
11 by individuals with disabilities at the property located at or about 103 E. 9th St., San  
12 Bernardino, California. This motion is based on this notice, the declarations submitted in  
13 support of this motion, and other matters which may be presented at the hearing.

14 Notice of the original motion for default judgment by court was served on  
15 Defendant J. N &J GROUP INVESTMENT LLC, on November 3, 2023, by first class  
16 United States Mail, postage prepaid.

17  
18 Dated: November 3, 2023

**SO. CAL. EQUAL ACCESS GROUP**

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21 By: /s/ Jason J. Kim  
22 Jason J. Kim, Esq.  
23 Attorneys for Plaintiff  
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